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July 17, 2000

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Associate Administrator for Hazardous Materials Safety Research and Special Programs Administration U.S. Department of Transportation 400 7th Street SW Washington, D.C. 20590-001 Attention: Exemptions, DHM-31

Subject: Request for renewal of exemption to packaging requirements contained in 49 CFR, Parts 171-180. Reference: DOT-E-12122

Dear Sir or Madam:

Atlantic Research Corporation requests renewal of Exemption number DOT-E-12122, which has a current expiration date of October 31, 2000. This application is submitted on behalf of:

> Atlantic Research Corporation Automotive Products Group Knoxville, Tennessee 37921 1729 midsonk Royal Telephone: 865-583-7700

Telephone: 865-583-7700

Fax: 865-583-7719

Attention: Mr. Tom Kyte

Atlantic Research Corporation certifies that the information contained in the initial application for exemption is accurate and still applies as submitted.

Since the inception of the use of this exemption by BAICO Inflator Company and then Atlantic Research Corporation, there have been over 2 million inflators manufactured and shipped to various customers. The inflators were manufactured, marked, and shipped in accordance with the provisions of DOT-E-12122.

Records of the testing performed during the manufacture of the inflators manufactured, marked, and offered for transportation in accordance with the provisions of DOT-E-12122 are on file at Atlantic Research Corporation. There has been no known incident of loss of packaging contents or packaging failure reported to Atlantic Research Corporation to date.

No changes in the design of the pressure vessels, pyrotechnic components, or production manufacturing processes were made since the initial use of the exemption that were not reviewed and approved by Arrowhead Industrial Services, Incorporated (the approved third party inspection service contracted by Atlantic Research Corporation) prior to incorporation. The independent inspection agency's design certification and related documentation are on file at Atlantic Research Corporation. One audit has been conducted by the independent inspection agency to verify compliance to the terms of the DOT-E-12122 exemption.

Should you need additional information, please contact the undersigned at 865-583-7721 or by fax at 865-583-7719. Your assistance in this matter is greatly appreciated.

Best regards,

T. W. Kyte

Sr. Reliability Engineer

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Atlantic Research Corporation

Automotive Products Group